

**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Mark A. Kornfeld  
Elizabeth A. Scully  
Thomas L. Long

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

v.

SIPA LIQUIDATION

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

(Substantively Consolidated)

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 10-04284 (SMB)

Plaintiff,

v.

PLAZA INVESTMENTS INTERNATIONAL  
LIMITED, and NOTZ, STUCKI MANAGEMENT  
(BERMUDA) LIMITED

Defendants.

**STIPULATION AND ORDER STAYING TRUSTEE'S RESPONSE TO  
DEFENDANT NOTZ STUCKI MANAGEMENT (BERMUDA) LIMITED'S  
MOTION TO DISMISS BASED ON EXTRATERRITORIALITY**

WHEREAS:

A. On June 19, 2015, Irving H. Picard (the "Trustee"), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-lll, and the substantively consolidated estate of Bernard L. Madoff ("Madoff") and Defendants Plaza Investments International Limited ("Plaza"), and Notz, Stucki Management (Bermuda) Limited ("NSMB"), reached a settlement agreement (the "Agreement") resolving the claims at issue in the above-captioned adversary proceeding. On that same day the Trustee filed with this Court a Motion seeking entry of an order, pursuant to section 105(a) of the United States Bankruptcy Code and Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure, approving the Agreement (the "9019 Motion"). The 9019 Motion is set to be heard on July 29, 2015.

B. The Trustee's response to NSMB's Motion to Dismiss Based on Extraterritoriality (Dkt No. 68) is due on June 30, 2015 before the pending 9019 Motion will be heard.

NOW, THEREFORE, subject to the approval of the Court, it is hereby STIPULATED AND AGREED that:

1. The Trustee is not required to file a response to NSMB's Motion to Dismiss Based on Extraterritoriality (Dkt No. 68) on June 30, 2015.

2. The Trustee's response to NSMB's Motion to Dismiss Based on Extraterritoriality (Dkt No. 68) is stayed in light of the pending 9019 Motion.

Dated: June 22, 2015

BAKER & HOSTETLER LLP

By: /s/ Elizabeth A. Scully  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Mark A. Kornfeld  
E-mail: [mkornfeld@bakerlaw.com](mailto:mkornfeld@bakerlaw.com)  
Thomas L. Long  
E-mail: [tlong@bakerlaw.com](mailto:tlong@bakerlaw.com)

--and--

Elizabeth A. Scully (*pro hac*)  
E-mail: [escully@bakerlaw.com](mailto:escully@bakerlaw.com)  
1050 Connecticut Ave., N.W., 1100  
Washington, D.C. 20036  
Telephone: (202) 861-1500  
Facsimile: (202) 861-1783

*Attorneys for Irving H. Picard,  
Trustee for the Substantively Consolidated  
SIPA Liquidation of the estate of Bernard L.  
Madoff Investment Securities LLC and the  
estate of Bernard L. Madoff*

Dated: New York, New York  
June 22<sup>nd</sup>, 2015

DEBEVOISE & PLIMPTON LLP

By: /s/ Joseph P. Moodhe  
919 Third Avenue  
New York, New York 10022  
Telephone: (212) 909-6000  
Facsimile: (212) 909-6836  
Joseph P. Moodhe  
Email: [jpmoodhe@debevoise.com](mailto:jpmoodhe@debevoise.com)  
J. Robert Abraham  
Email: [jrabraham@debevoise.com](mailto:jrabraham@debevoise.com)  
Shannon Rose Selden  
Email: [srselden@debevoise.com](mailto:srselden@debevoise.com)

*Attorneys for Defendants Plaza Investments  
International Limited, and Notz, Stucki  
Management (Bermuda) Limited*

SO ORDERED.

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE